

JOHN K. BENNETT, ESQ. (JB-0527)
JACKSON LEWIS LLP
220 Headquarters Plaza
East Tower, 7th Floor
Morristown, New Jersey 07960
(973) 538-6890
Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

-----X
ROBERT SCULL,

Plaintiff,

vs.

THE WACKENHUT CORPORATION,

Defendant.
-----X

Hon. _____

Civil Action No. 10 - _____ ()

NOTICE OF REMOVAL

TO: THE CHIEF JUDGE AND JUDGES OF THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

This Notice of Removal by Defendant, The Wackenhut Corporation ("TWC"), a corporation of the State of Florida, having its principal place of business located at 4200 Wackenhut Drive, Palm Beach Gardens, Florida, respectfully shows, in accordance with the provisions of 28 U.S.C. § 1446, that this action is properly removed from the Superior Court of New Jersey, Law Division, Salem County, to this United States District Court, as follows:

1. This civil action was commenced on or about June 8, 2010, by the plaintiff, Robert Scull, residing at 44 Porchtown Road, Pittsgrove, Salem County, New Jersey, by filing a Verified Complaint against TWC, Docket No. SLM-L-0193-10. A true and correct copy of the Summons and Verified Complaint is attached hereto as Exhibit A.

2. TWC was served with the Summons and Verified Complaint on August 11, 2010.

True and correct copies of the notice of service of process is attached hereto as Exhibit B.

3. No proceedings have taken place in the state court action. TWC has not served an answer or responsive pleading to plaintiff's Verified Complaint or made any appearance or argument before the Superior Court.

4. This Notice of Removal is timely filed within 30 days of service of the Summons and Complaint, pursuant to 28 U.S.C. § 1446(b), thereby allowing TWC to remove, pursuant to 28 U.S.C. § 1441, on the basis of this Court's diversity-of-citizenship jurisdiction.

5. This action arises out of plaintiff's claims in his Verified Complaint that TWC unlawfully terminated his employment because of his age, and in retaliation for his allegedly having complained of safety issues at his workplace.

6. The plaintiff is a citizen of New Jersey. TWC, the sole defendant named in this action, is a Florida corporation having its principal place of business in Palm Beach Gardens, Florida, and is therefore a citizen of the State of Florida.


7. The amount in controversy in this action meets or exceeds the jurisdictional amount required by 28 U.S.C. § 1332(a).

8. Consequently, this Court has original jurisdiction over this matter based on diversity of citizenship, pursuant to 28 U.S.C. §§ 1332 and 1441.

9. TWC submits this Notice of Removal without waiving any defenses to the claim(s) asserted by plaintiff, including improper service of process, or conceding that plaintiff has pled claim(s) upon which relief can be granted.

WHEREFORE, defendant TWC respectfully requests that this action proceed in its entirety in this Court as an action properly removed hereto.

JACKSON LEWIS LLP
Attorneys for Defendant

By: 
JOHN K. BENNETT

Dated: September 10, 2010

167169 plead001 (nor)
4830-4463-8471, v. 1

EXHIBIT A

423 White Horse Pike
Haddon Heights, NJ 08035
856.222.9991 Telephone
856.222.9994 Fax
www.pappaswolf.com



Hercules Pappas •
Matthew S. Wolf ✕
• Member NJ, PA, NY Bar
✕ Member NJ & PA Bar
John J. Richardson ✕
Of Counsel

August 5, 2010

Certified Mail – R. R.R.

Corporation Service Company
1201 Hays Street
Tallahassee FL 32301-2525

Re: Robert Scull v. Wackenhut Corporation
Docket No.: SLM-L-193-10

Dear Sir/Madam:

Enclosed please find an original Summons and copy of the Complaint and CIS, attached for service upon the defendant, Wackenhut Corporation.

Thank you for your assistance to this matter. Should you have any questions or concerns, please feel free to contact my office.

Very truly yours,
PAPPAS & WOLF, LLC

Matthew S. Wolf
Matthew S. Wolf, Esquire

cc: Robert Scull

MW/sp

Matthew S. Wolf, Esquire
Pappas & Wolf, LLC
423 White Horse Pike
Haddon Heights, NJ 08035
TEL: (856) 222-9991
FAX: (856) 222-9994
Attorneys for Plaintiff

ROBERT SCULL,

Plaintiff,

vs.

THE WACKENHUT CORPORATION,

Defendant.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION
SALEM COUNTY

Civil Action

Docket No.: SLM-193-10

SUMMONS

From The State of New Jersey To The Defendant(s) Named Above:

THE WACKENHUT CORPORATION

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (The address of each deputy clerk of the Superior Court is provided.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$135 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

Dated: August 5, 2010

/s/ Jennifer M. Perez
Jennifer M. Perez,
Acting Clerk of the Superior Court

Name of Defendant to Be Served: The Wackenhut Corporation c/o Corporation Service Co.
Address of Defendant to Be Served: 1201 Hays Street, Tallahassee, FL 32301-2525

**DIRECTORY OF SUPERIOR COURT DEPUTY CLERK'S OFFICES
COUNTY LAWYER REFERRAL AND LEGAL SERVICES OFFICES**

ATLANTIC COUNTY:

Deputy Clerk of the Superior Court
Civil Division, Direct Filing
1201 Bacharach Blvd., First Fl.
Atlantic City, NJ 08401

LAWYER REFERRAL
(609) 345-3444

LEGAL SERVICES
(609) 348-4200

BERGEN COUNTY:

Deputy Clerk of the Superior Court
Civil Division, Room 115
Justice Center
10 Main St.
Hackensack, NJ 07601

LAWYER REFERRAL
(201) 488-0044

LEGAL SERVICES
(201) 487-2166

BURLINGTON COUNTY:

Deputy Clerk of the Superior Court
Central Processing Office
Attn: Judicial Intake First Fl.,
Courts Facility
49 Rancocas Rd.
Mt. Holly, NJ 08060

LAWYER REFERRAL
(609) 261-4862

LEGAL SERVICES
(800) 496-4570

CAMDEN COUNTY:

Deputy Clerk of the Superior Court
Civil Processing Office
Hall of Justice 1st Fl., Suite 150
101 South 5th Street
Camden, NJ 08103

LAWYER REFERRAL
(856) 964-4520

LEGAL SERVICES
(856) 964-2010

CAPE MAY COUNTY:

Deputy Clerk of the Superior Court
9 N. Main Street
Cape May Court House, NJ 08210

LAWYER REFERRAL
(609) 463-0313

LEGAL SERVICES
(609) 465-3001

CUMBERLAND COUNTY:

Deputy Clerk of the Superior Court
Civil Case Management Office
60 West Broad Street
P.O. Box 10
Bridgeton, NJ 08302

LAWYER REFERRAL
(856) 692-6207

LEGAL SERVICES

(856) 451-0003

ESSEX COUNTY:

Deputy Clerk of the Superior Court
Civil Customer Service Hall of Records, Room 201
465 Dr. Martin Luther King Jr. Blvd.
Newark, NJ 07102

LAWYER REFERRAL

(973) 622-6204

LEGAL SERVICES

(973) 624-4500

GLOUCESTER COUNTY:

Deputy Clerk of the Superior Court
Civil Case Management Office
Attn: Intake First Fl., Court House
1 North Broad Street
Woodbury, NJ 08096

LAWYER REFERRAL

(856) 848-4589

LEGAL SERVICES

(856) 848-5360

HUDSON COUNTY:

Deputy Clerk of the Superior Court
Superior Court, Civil Records Dept.
Brennan Court House--1st Floor
583 Newark Ave.

Jersey City, NJ 07306

LAWYER REFERRAL

(201) 798-2727

LEGAL SERVICES

(201) 792-6363

HUNTERDON COUNTY:

Deputy Clerk of the Superior Court
Civil Division
65 Park Avenue
Flemington, NJ 08822

LAWYER REFERRAL

(908) 735-2611

LEGAL SERVICES

(908) 782-7979

MERCER COUNTY:

Deputy Clerk of the Superior Court
Local Filing Office, Courthouse
175 S. Broad Street,
P.O. Box 8068
Trenton, NJ 08650

LAWYER REFERRAL

(609) 585-6200

LEGAL SERVICES

(609) 695-6249

MIDDLESEX COUNTY:

Deputy Clerk of the Superior Court
Middlesex Vicinage 2nd Floor
Tower 56 Paterson Street
P.O. Box 2633
New Brunswick, NJ 08903-2633

LAWYER REFERRAL

(732) 828-0053

LEGAL SERVICES

(732) 249-7600

MONMOUTH COUNTY:

Deputy Clerk of the Superior Court
Court House
P.O. Box 1269

Freehold, NJ 07728-1269

LAWYER REFERRAL

(732) 431-5544

LEGAL SERVICES

(732) 866-0020

MORRIS COUNTY:

Morris County Courthouse

Civil Division

Washington and Court Streets

P. O. Box 910

Morristown, NJ 07963-0910

LAWYER REFERRAL

(973) 267-5882

LEGAL SERVICES

(973) 285-6911

OCEAN COUNTY:

Deputy Clerk of the Superior Court

118 Washington Street, Room 121

P.O. Box 2191

Toms River, NJ 08754-2191

LAWYER REFERRAL

(732) 240-3666

LEGAL SERVICES (732) 341-2727

PASSAIC COUNTY:

Deputy Clerk of the Superior Court

Civil Division, Court House

77 Hamilton Street

Paterson, NJ 07505

LAWYER REFERRAL

(973) 278-9223

LEGAL SERVICES

(973) 523-2900

SALEM COUNTY:

Deputy Clerk of the Superior Court

Attn: Civil Case Management Office

92 Market Street

Salem, NJ 08079

LAWYER REFERRAL

(856) 678-8363

LEGAL SERVICES

(856) 451-0003

SOMERSET COUNTY:

Deputy Clerk of the Superior Court

Civil Division

P.O. Box 3000

40 North Bridge Street

Somerville, N.J. 08876

LAWYER REFERRAL

(908) 685-2323

LEGAL SERVICES

(908) 231-0840

SUSSEX COUNTY:

Deputy Clerk of the Superior Court

Sussex County Judicial Center

43-47 High Street

Newton, NJ 07860

LAWYER REFERRAL

(973) 267-5882

LEGAL SERVICES

(973) 383-7400

UNION COUNTY:

Deputy Clerk of the Superior Court

1st Fl., Court House

2 Broad Street

Elizabeth, NJ 07207-6073

LAWYER REFERRAL

(908) 353-4715

LEGAL SERVICES

(908) 354-4340

WARREN COUNTY:

Deputy Clerk of the Superior Court

Civil Division Office

Court House

413 Second Street

Belvidere, NJ 07823-1500

LAWYER REFERRAL

(973) 267-5882

LEGAL SERVICES

(908) 475-2010

SALEM CO CIVIL CASE MGMT
SUPERIOR COURT LAW DIV
92 MARKET STREET
SALEM NJ 08079

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (856) 935-7510
COURT HOURS

DATE: JUNE 09, 2010
RE: ROBERT SCULL VS WACKENHUT CORPORATION
DOCKET: SLM L -000193 10

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 3.

DISCOVERY IS 450 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST

THE PRETRIAL JUDGE ASSIGNED IS HON DAVID W. MORGAN

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 001
AT: (856) 935-7510 EXT 8210.



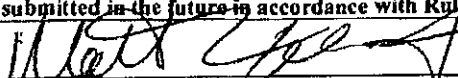
IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R 4:5A-2

ATTENTION:

ATT: MATTHEW S. WOLF
PAPPAS & WOLF
423 WHITE HORSE PIKE
HADDON HTS NJ 08035-1706

JUPL02

Appendix XII-B1

CIVIL CASE INFORMATION STATEMENT (CIS)		FOR USE BY CLERK'S OFFICE ONLY	
 <p>Use for initial Law Division Civil Part pleadings (not motions) under Rule 4:5-1 Pleading will be rejected for filing, under Rule 1:5-6(c), if information above the black bar is not completed or if attorney's signature is not affixed.</p>		PAYMENT TYPE: <input type="checkbox"/> CK <input type="checkbox"/> CG <input type="checkbox"/> CA	
		CHG/CK NO.:	
		AMOUNT:	
		OVERPAYMENT:	
		BATCH NUMBER:	
ATTORNEY/PRO SE NAME Matthew S. Wolf, Esquire	TELEPHONE NUMBER (856) 222-9991	COUNTY OF VENUE Salem	
FIRM NAME (If applicable) Pappas & Wolf, LLC	DOCKET NUMBER (When available) SLM-L- 193-10		
OFFICE ADDRESS 423 White Horse Pike Haddon Heights, New Jersey 08035	DOCUMENT TYPE Complaint		
		JURY DEMAND <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
NAME OF PARTY (e.g., John Doe, Plaintiff) Robert Scull	CAPTION Robert Scull v. The Wackenhut Corporation		
CASE TYPE NUMBER (See reverse side for listing) 618	IS THIS A PROFESSIONAL MALPRACTICE CASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53A-27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.		
RELATED CASES PENDING? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	IF YES, LIST DOCKET NUMBERS		
DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY, IF KNOWN <input type="checkbox"/> NONE <input checked="" type="checkbox"/> UNKNOWN		
THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.			
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION			
DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	IF YES, IS THAT RELATIONSHIP <input checked="" type="checkbox"/> EMPLOYER-EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> OTHER (explain) <input type="checkbox"/> FAMILIAL <input type="checkbox"/> BUSINESS		
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO			
USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION:			
 DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION:		
WILL AN INTERPRETER BE NEEDED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	IF YES, FOR WHAT LANGUAGE:		
I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).			
ATTORNEY SIGNATURE: 			

SIDE 2

CIVIL CASE INFORMATION STATEMENT (CIS)

Use for initial pleadings (not motions) under *Rule 4:5-1***CASE TYPES** (Choose one and enter number of case type in appropriate space on the reverse side.)**Track I — 150 days' discovery**

- 151 NAME CHANGE
- 175 FORFEITURE
- 302 TENANCY
- 399 REAL PROPERTY (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)
- 502 BOOK ACCOUNT (debt collection matters only)
- 505 OTHER INSURANCE CLAIM (INCLUDING DECLARATORY JUDGMENT ACTIONS)
- 508 PIP COVERAGE
- 510 UM or UIM CLAIM
- 511 ACTION ON NEGOTIABLE INSTRUMENT
- 512 LEMON LAW
- 801 SUMMARY ACTION
- 802 OPEN PUBLIC RECORDS ACT (SUMMARY ACTION)
- 999 OTHER (Briefly describe nature of action)

Track II — 300 days' discovery

- 305 CONSTRUCTION
- 509 EMPLOYMENT (other than CEPA or LAD)
- 599 CONTRACT/COMMERCIAL TRANSACTION
- 603 AUTO NEGLIGENCE — PERSONAL INJURY
- 605 PERSONAL INJURY
- 610 AUTO NEGLIGENCE — PROPERTY DAMAGE
- 699 TORT — OTHER

Track III — 450 days' discovery

- 005 CIVIL RIGHTS
- 301 CONDEMNATION
- 602 ASSAULT AND BATTERY
- 604 MEDICAL MALPRACTICE
- 606 PRODUCT LIABILITY
- 607 PROFESSIONAL MALPRACTICE
- 608 TOXIC TORT
- 609 DEFAMATION
- 616 WHISTLEBLOWER / CONSCIENTIOUS EMPLOYEE PROTECTION ACT (CEPA) CASES
- 617 INVERSE CONDEMNATION
- 618 LAW AGAINST DISCRIMINATION (LAD) CASES
- 620 FALSE CLAIMS ACT

Track IV — Active Case Management by Individual Judge / 450 days' discovery

- 156 ENVIRONMENTAL/ENVIRONMENTAL COVERAGE LITIGATION
- 303 MT. LAUREL
- 508 COMPLEX COMMERCIAL
- 513 COMPLEX CONSTRUCTION
- 514 INSURANCE FRAUD
- 701 ACTIONS IN LIEU OF PREROGATIVE WRITS

Centrally Managed Litigation (Track IV)

- 280 Zelnorm
- 285 Stryker Trident Hip Implants

Mass Tort (Track IV)

- | | |
|---------------------------------------|--|
| 248 CIBA GEIGY | 279 GADOLINIUM |
| 266 HORMONE REPLACEMENT THERAPY (HRT) | 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL |
| 271 ACCUTANE | 282 FOSAMAX |
| 272 BEXTRA/CELEBREX | 283 DIGITEK |
| 274 RISPERDAL/SEROQUEL/ZYPREXA | 284 NUVARING |
| 275 ORTHO EVRA | 286 LEVAQUIN |
| 277 MAHWAH TOXIC DUMP SITE | 601 ASBESTOS |
| 278 ZOMETA/AREXIA | 619 VIOXX |

If you believe this case requires a track other than that provided above, please indicate the reason on Side 1, in the space under "Case Characteristics."

Please check off each applicable category:

☐ Verbal Threshold☐ Putative Class Action☐ Title 59

Matthew S. Wolf, Esquire
Pappas & Wolf, LLC
423 White Horse Pike
Haddon Heights, NJ 08035
TEL: (856) 222-9991
FAX: (856) 222-9994
Attorneys for Plaintiff

ROBERT SCULL,

Plaintiff,

vs.

THE WACKENHUT CORPORATION

Defendant.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION
SALEM COUNTY

Civil Action

Docket No.:

L-193-10

VERIFIED COMPLAINT
(JURY TRIAL DEMANDED)

Plaintiff, Robert Scull, by way of Complaint through the undersigned counsel, hereby alleges and avers against the defendant The Wackenhut Corporation:

PARTIES

1. Plaintiff Robert Scull at all times relevant hereto has resided at 44 Porchtown Road, Pittsgrove, Salem County, New Jersey.
2. Defendant The Wackenhut Corporation is a security services corporation which provides security services at the Salem Nuclear Power Plant.

FACTS

3. Plaintiff was employed by The Wackenhut Corporation for several years, since approximately November of 1989.
4. Plaintiff was a member of the security team securing the Salem Nuclear Power Plant.
5. Throughout the course of his employment, Plaintiff was qualified for his position and performed well.
6. At some point in time, Plaintiff began notifying his employer regarding safety concerns at the Nuclear Power Plant. As a result of his notification, changes were made to better secure the facility.
7. In 2009, Plaintiff again became concerned regarding a safety issue at the Nuclear Power Plant. Again, after exhausting efforts to change the security issue, Plaintiff advised The Wackenhut Corporation that he was prepared to make his complaint regarding safety

through alternative approved channels established for the purpose of making safety issues known and corrected.

8. Plaintiff is also one of the older employees with longevity as a guard employed by The Wackenhut Corporation at the Nuclear Power Plant.
9. Plaintiff was terminated on October 23, 2009. At that time, Plaintiff was 49 years old and the highest paid uniformed supervisor to the best of his knowledge, which pay was merited based on the many years of faithful service to the company and to the safety of the Nuclear Power Plant.
10. The high pay was also based on the successful performance of the Plaintiff.
11. The conduct of the defendant in discharging the Plaintiff on account of either his age or his complaints regarding the safety of the Nuclear Power Plant was, in the alternative, willful, wanton and reckless.

COUNT I

12. Plaintiff incorporates by reference all of the preceding paragraphs as though they were more fully set forth herein.
13. Defendant The Wackenhut Corporation discharged the Plaintiff on account of his age, in violation of the Law Against Discrimination, N.J.S.A. § 10:5-1, et seq. ("the LAD").

WHEREFORE, Plaintiff demands Judgment against Defendant The Wackenhut Corporation for compensatory damages, punitive damages, attorney's fees, interest, costs and such further relief as the Court may find just and equitable.

COUNT II

14. Plaintiff incorporates by reference all of the preceding paragraphs as though they were more fully set forth herein.
15. In the alternative and possibly in combination with the foregoing, Plaintiff had complained safety issues at the Nuclear Power Plant and, as a result, defendant retaliated against the Plaintiff in violation of the New Jersey Conscientious Employee Protection Act, N.J.S.A. 34:19-1, et seq. ("CEPA").

WHEREFORE, Plaintiff demands Judgment against Defendant The Wackenhut Corporation for compensatory damages, punitive damages, attorney's fees, interest, costs and such further relief as the Court may find just and equitable.

DESIGNATION OF TRIAL COUNSEL

Matthew S. Wolf is designated as trial counsel in this action.

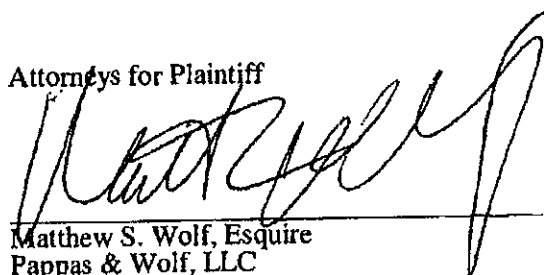
CERTIFICATION PURSUANT TO RULE 4:5-1

I hereby certify that the within matter in controversy is not the subject of any other lawsuit or arbitration proceeding and that there is no other party who should be joined in this action at this time.

JURY TRIAL DEMAND

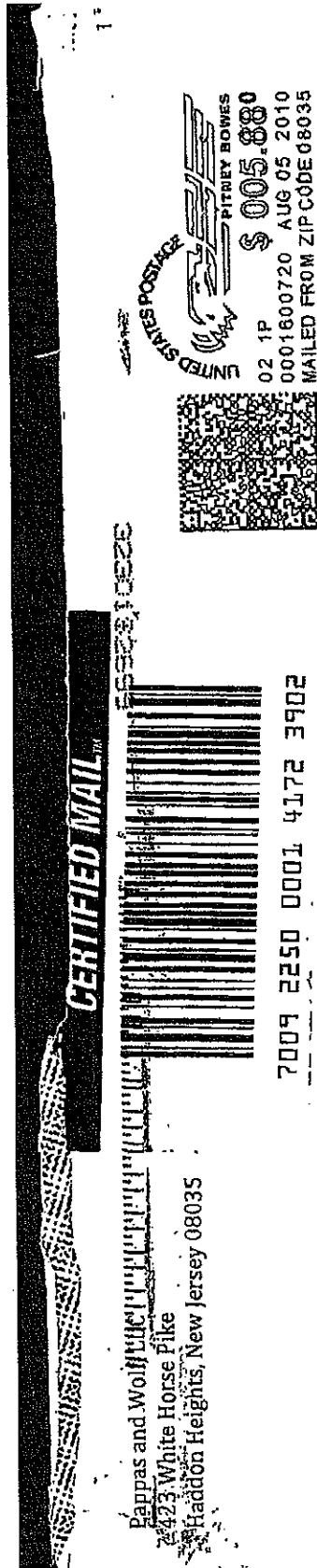
Plaintiffs hereby demand trial by jury as to all such issues so triable.

Attorneys for Plaintiff



Matthew S. Wolf, Esquire
Pappas & Wolf, LLC
423 White Horse Pike
Haddon Heights, NJ 08035
TEL: (856) 222-9991
FAX: (856) 222-9994
Attorneys for Plaintiff

June 4, 2010



Corporation Service Company
1201 Hays Street
Tallahassee FL 32301-2525

EXHIBIT B

Karen Savignac

From: sop@cscinfo.com
Sent: Wednesday, August 11, 2010 1:10 PM
To: Karen Savignac
Subject: Notice of Service of Process

Corporation Service Company ®

CSC SameDay SOP and CSC PowerBrief clients, click [here](#) to receive and view your Service of Process documents now. For more information on instant access to your SOP, click [Sign Me Up](#).

NOTICE OF SERVICE OF PROCESS

Transmittal Number: 7902458
Date: 08/11/2010

Pursuant to client instructions, we are forwarding this summary and notice of Service of Process. The Service of Process document has been sent to the primary contact listed below.

Entity:	The Wackenhut Corporation
Entity I.D. Number:	0514713
Entity Served:	The Wackenhut Corporation
Title of Action:	Robert Scull vs. The Wackenhut Corporation
Document(s) type:	Summons/Complaint
Nature of Action:	Discrimination
Court:	Salem County Superior Court, New Jersey
Case Number:	SLM-193-10
Jurisdiction Served:	Florida
Date Served on CSC:	08/11/2010
Answer or Appearance Due:	35 Days
Originally Served On:	CSC
How Served:	Certified Mail

Sender Information:

Matthew S. Wolf
856-222-9991

Primary Contact:

Ms. Karen Savignac
G4S Companies

Copy of transmittal only provided to:

Ms. Jackie Stankard

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the document(s) and taking appropriate action.

Please visit www.cscglobal.com for more information on CSC's Litigation and Matter Management services, including service of process (SOP) history, online acknowledgement of SOP, fully electronic scanned SOP and SOP package tracking information.

CSC is SAS70 Type II certified for its Litigation Management System.

2711 Centerville Road Wilmington, DE 19808
(888) 690-2882 |